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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Margaret Castro,

Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:23-cv-00333-SKO

STIPULATION AND UNOPPOSED
MOTION FOR EXTENSION OF
TIME; ORDER

(Doc. 12)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from June 5, 2023 to August 4, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due to several merit briefs being due

1 on the same week. For the weeks of June 5, 2023 and June 12, 2023, Counsel
2 currently has 26 merit briefs, and several letter briefs and reply briefs. Counsel
3 requires additional time to brief the issues thoroughly for the Court's consideration.
4 Defendant does not oppose the requested extension. Counsel apologizes to the
5 Defendant and Court for any inconvenience this may cause.

6 Respectfully submitted,

7 Dated: May 30, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

9 By: /s/ Jonathan Omar Pena
10 JONATHAN OMAR PENA
11 Attorneys for Plaintiff

13 Dated: May 30, 2023

14 PHILLIP A. TALBERT
15 United States Attorney
16 MATHEW W. PILE
17 Associate General Counsel
18 Office of Program Litigation
19 Social Security Administration

20 By: */s/ Oscar Gonzalez de Llano
21 Oscar Gonzalez de Llano
22 Special Assistant United States Attorney
23 Attorneys for Defendant
24 (*As authorized by email on May 30, 2023)
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ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion for an extension of time (Doc. 12), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including August 4, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: **May 31, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE